

## Nicola Gunn

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**From:** Contact Centre (CRM) <contact@ribblevalley.gov.uk>  
**Sent:** 21 March 2022 14:20  
**To:** Planning  
**Subject:** Planning Application Comments - 3/2021/0660

[REDACTED]

**Address:**

[REDACTED]

**Planning Application Reference No.:** 3/2021/0660

**Address of Development:** Bowland Section. From land near the convergence of the Hornby Road, the Roman Road and Shooters Clough to land west of Newton in Bowland; with highway works at various locations.

**Comments:** Firstly, the Lancashire Wildlife Trust would like to take this opportunity to acknowledge that there has been a good dialogue with staff from United Utilities and TEP, involving online meetings in February, March and December 2021, and a site visit on the 14th May 2021. However, there are a number of serious potential impacts on the Gamble Hole Farm Pasture Biological Heritage Site (BHS – the Local Wildlife Sites system in Lancashire) that has led to the response below.

Secondly, it is highly recommended that the Council employs the services of an experienced independent consultant to check the Biodiversity Net Gain metric calculations associated with the application, as experience from The Wildlife Trusts is revealing that consultants often underplay the value of baseline habitats and overplay the mitigation and compensation values.

The Lancashire Wildlife Trust OBJECTS to application 3/21/0660 on the following grounds:

1. The importance of the Gamble Hole Farm Pasture BHS is played down in the Bowland Section Non-technical summary document. Only in the Technical Appendices to the Environmental Statement is it acknowledged that it supports 'habitat of principal importance' (Priority Habitat under Section 41 of the Natural Environment and Rural Communities Act 2006). The true value and importance of the BHS is not clearly recognised in those parts of the application that most people are going to see. It should be noted that some of the habitats on the BHS are of European importance and that the BHS may meet the Site of Special Scientific Interest (SSSI) guidelines for site selection. Natural England designates a representative sample of sites that meet the relevant guideline, not all of the sites.
2. Between 0.04 hectare (ha) and 0.53 ha of internationally important fen habitat within the 12m access corridor crossing Gamble Hole Farm Pasture BHS could be lost temporarily (assuming future restoration is successful) or permanently, which represents between 3.6% and 19.6% of the total BHS area (Table 9A.9). It should be noted that any new 'fen' habitat is most unlikely to be an adequate replacement for the calcareous spring mounds within the BHS, dependent as they are on very site-specific groundwater arisings, waterflow and ecological-hydrological interactions.
3. In the National Vegetation Classification (NVC) row in Table 9A.2 of the ES Vol 4 Chapter 9A: Terrestrial Ecology it is stated that "Botanical survey of target vegetation communities, applying MAVIS to quadrat data to identify closest fit NVC community types". However, according to Professor John Rodwell, the author of the NVC and the NVC Users' Handbook, computerised keys (such as MAVIS) should never be used alone to provide identifications of NVC communities. The Trust has received correspondence from Dr Bryan D Wheeler, Reader in Wetland Ecology at the University of Sheffield, that disagrees with the NVC communities stated in the terrestrial ecology chapter.

4. It is stated that the unavoidable partial loss of the Gamble Hole Farm Pasture BHS would be offset by a conservation package to be agreed with the LPA and relevant statutory consultees, which is not available for scrutiny by third parties including non-governmental organisations and local residents. The Wildlife Trust would like to be involved in the development and agreement of this conservation package.

5. It is proposed to create a new area of semi-natural woodland 'at the western edge of the Newton in Bowland Compound'. However, the most ecologically important part of Gamble Hole Farm Pasture BHS is at the western edge of the compound, hence the Trust is very concerned that the proposed woodland creation would have negative impacts on the ecological interests of the site.

6. Potential adverse impacts on road widening works on roadside BHS and species-rich roadside banks on Newton Fell.

7. Potential risk of works and subsequent construction traffic spreading Himalayan Balsam, an invasive non-native species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), into the Hodder Valley. This species is locally abundant and increasing yearly by the Fell Road, and on adjacent land, north of Teewood Farm, Waddington.

If the Council was minded to approve the application, then Lancashire Wildlife Trust requests that the following conditions are attached as legally binding obligations to the approval:

1. Areas of woodland creation are located as close to the site, ideally adjacent to, of trees that have to be felled as part of the planning application, and are not created within the BHS or on land of existing ecological value including priority habitats or land supporting priority species that would be adversely affected by proposed woodland creation.

2. Appropriate physical protection should be given to those sections of roadside verge which are of special conservation value in order to avoid accidental damage or destruction of their ecological interest(s).

3. That an invasive non-native species control and eradication action plan, including but not restricted to Himalayan Balsam, is produced in agreement with the LPA and relevant statutory consultees.

Additional notes:

1. The Bowland Section Environmental Statement Consultation Schedule refers to ongoing discussions with interested parties on the management of the Gamble Hole Farm Pasture BHS and also of the 'Newton in Bowland Habitat Creation Site'. The Marl Hill Section of the application contains details of a proposed Newton in Bowland Habitat Creation Site on either side of the River Hodder to the south of the Newton - Dunsop road downstream of Newton Bridge - the northwest corner of the site downstream of Barge Ford to be developed as 'Lowland Fen', and most of the remainder into 'species-rich' grassland. The Wildlife Trust would like to be involved in the long-term monitoring and management of these sites.

2. In addition to the proposed Highways Stakeholder Group, United Utilities should be encouraged to set up and administer a Conservation Stakeholder Group, both of which should be open to representation from special interest groups. The Conservation Stakeholder Group should include both natural heritage (biological and geological) and cultural heritage (archaeology, landscape and the historical environment).

I trust that this OBJECTION will be taken fully into account.

If you have any queries about any aspect of the above, please contact me at the address below.

I would be grateful if you could let me know the outcome of this application and inform me if there are any subsequent applications for the site.

Yours sincerely,

